

September 17, 2009

Department of the Interior Minerals Management Service (MS 4024) Attn: Rules Processing Team (Comments) 381 Elden Street Herndon, VA 20170-4817

Re: RIN 1010-AD 47; Annular Casing Pressure Management

MMS-2008-OMM-0068 FR Vol. 74, No. 146 7-31-09

Ladies and Gentlemen:

The Offshore Operators Committee (OOC) appreciates this opportunity to provide written comments on the subject proposed rule to incorporate by reference API RP 90 published on July 31, 2009 in the Federal Register (74 FR 38147). OOC is an organization of over 130 companies that conduct essentially all of the OCS oil and gas exploration and production activities in the Gulf of Mexico. Comments made on behalf of OOC are submitted without prejudice to any member's right to have or express different or opposing views and we have encouraged all of our members to submit comments on the proposed rulemaking.

OOC shares MMS's concern about safety of personnel and protection of the environment. By incorporating API RP 90 into the regulation, the agency is utilizing a jointly developed standard to address a challenging issue. OOC and the American Petroleum Institute (API) have worked with MMS on developing the standard and have facilitated the roll out of the RP to OCS operators. This document was developed with the strong leadership and support from MMS. Since its publication, we, along with MMS, have encouraged our industry to utilize API RP90 in their operations. We believe API RP 90 provides an excellent basis for developing a management program to address annular casing pressure. The RP allows operators to style their plans according to their existing infrastructure and corporate culture. We support the agency's action and appreciate the opportunity for OOC to provide comments on this very important issue. Further, we look forward to continued collaboration between Industry and the agency on the development of other industry guidance documents that help our industry achieve mutually desired performance objectives.

If you have any questions, please contact me at 504-236-7933, or via e-mail at Vrat50@aol.com

Respectfully submitted,

Allen J. Verret

Allen J. Verret Executive Director Offshore Operators Committee

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Very truly yours,

Allen J Verret, PE Executive Director